

REMARKS

Claims 1 - 9, 19 - 32 and 38 remain active in this application. Claims 10 - 18, 33 - 37 and 39 - 44 have) previously been canceled. Claims 1 - 9, 19 - 32 and 38 have been amended to improve form, clarity and accuracy. Support for the amendments of the claims is found throughout the application. New claims 45 and 46 have been added to include recitations removed from claims 1 and 19, respectively, which are unnecessary to the patentability thereof. No new matter has been introduced into the application. The indication of allowability of the subject matter of claims 19 - 32 and 38 is noted with appreciation.

The indication that the drawings filed August 22, 2003, have been accepted is noted with appreciation. Formal drawings incorporating the revisions for which approval was requested on that date and other proposed revisions submitted March 12, 2003, and August 23, 2002, insofar as those proposed revisions were approved by the Examiner, are submitted concurrently herewith. Acceptance of these formal drawing is respectfully requested.

The Examiner has objected to claims 1, 22, 24, 31 and 38 as containing informalities and required correction. This objection is respectfully traversed as being in error or moot in view of the amendments made above.

Specifically, it is respectfully submitted that the Examiner's observation concerning claim 31 is incorrect since claim 31 depends from claim 26 in which antecedent language for recitation of "said MOS transistors" is clearly present. As to the Examiner's other observations, it is respectfully submitted that the above amendments supply the required corrections and antecedent language correspondence is believed to have been made exact. Further, in regard to claim 32,

it is respectfully pointed out that antecedent language for "said MOS switching device" (now "MOS transistor") appears at lines 3 and 4 of claim 32 (as presented above) in which it is recited that the discrete switching devices of claim 23 comprise an MOS transistor and the antecedent language for the recitation "said second terminal of said MOS transistor" appears in claim 23 in regard to the discrete switching devices, now defined, at this point of claim 32, as comprising an MOS transistor which, of course, has the terminals defined in claim 23. Accordingly, reconsideration and withdrawal of these objections is respectfully requested. Upon such reconsideration, if any further possible informalities are noted by the Examiner, it is respectfully requested that the undersigned be contacted by telephone at the number given below in order to expeditiously resolve the same.

Claims 1 - 9 have been rejected under 35 U.S.C. §112, first paragraph, as failing to comply with the written description requirement of this statute. This ground of rejection, as presently understood, is respectfully traversed as being moot in view of the amendments made above.

Specifically, it is now understood that this ground of rejection is not based on any *substantive* insufficiency of the written description but that terminology of the preambles of the rejected claims are inconsistent with the statement that "emitter controlled thyristors" are monolithic devices while "emitter turn-off thyristors" are "hybrid" devices. The following sentence of the same passage of the disclosure indicates that both monolithic devices and hybrid devices operate "on the same principle of *emitter control*" (emphasis added). Therefore, it is seen that claims 1 - 9 (as rejected) are, in fact, consistent with the specification in referring to the

principle of operation and the Examiner's position is tenable only to the extent that the claim language is restrictively read on an "emitter controlled thyristor (ECT)" (i.e. as the Examiner has used the acronym "ECT", which does not appear in claims 1 - 9, to identify the restrictive construction of the language, as distinguished from a more broad, *descriptive* construction). Therefore, it is respectfully submitted that the Examiner's position is not well-taken and that this ground of rejection is in error since there is no substantive insufficiency of the disclosure and the terminology of the claims has explicit and verbatim support in the specification.

It is also respectfully submitted that the Examiner's additional commentary regarding disclosure of a floating ohmic contact, a metal strap and the like are also in error since the drawings illustrate and the specification describes such features in connection with an ECT monolithic device as well as schematically which is inclusive of both ECT and ETO devices. Therefore, even under the restrictive construction placed on the claims by the Examiner, the inclusion of a floating ohmic contact, metal strap and the like in an ECT device are literally and explicitly illustrated and described and corresponding electrical nodes and structures are also illustrated and described in connection with hybrid (e.g. ETO) devices and device packages.

Nevertheless, to expeditiously resolve the matter and because there is some possibility of confusion similar to that on which the Examiner bases this ground of rejection, the "emitter controlled" terminology has been deleted from claims 1 - 9 as redundant over the emitter control/emitter turn-off function described in detail in the last paragraph of claim 1. Accordingly, it is respectfully submitted that this ground of rejection has been rendered moot by the above

amendments to claims 1 - 9 and reconsideration and withdrawal thereof is respectfully requested.

Claims 19 - 32 and 38 have been rejected under 35 U.S.C. §112, second paragraph, as being indefinite. This rejection is also respectfully traversed.

In discussing this ground of rejection, the Examiner notes the disclosure of a packaged gate turn-off (GTO) thyristor but questions the reference in the claim preambles to "a GTO device package". It is respectfully submitted that a "device package" can properly and descriptively be identified by a portion of the contents and that the phrase "GTO device package" is neither indefinite nor misdescriptive. Therefore, it is respectfully submitted that the Examiner's position is not well-taken and that the stated ground of rejection is in error on this point. Nevertheless, to expeditiously resolve the issue, the reference to "GTO" and "gate turn-off" in the preambles of claims 23 - 32 (and the reference to an emitter turn-off (ETO) device package in the preamble of claim 38) has been deleted as superfluous over the recitation of a "gate turn-off (GTO) thyristor" elsewhere on claim 23. As noted in the response to the rejection of claims 1 - 9, the emitter turn-off *function* is recited in detail in the final paragraph of each of these claims.

Accordingly, it is respectfully submitted that no basis for the Examiner's questioning of these claims remains in the claims and the stated ground of rejection is untenable. Moreover, the Examiner's questioning of claim terminology and/or the Examiner's preference for other language does not support a rejection as long as the scope of the claims is reasonably determinable; which the Examiner has not questioned.

In regard to the Examiner's criticisms of claims 24, 26, 27 and 32, it is respectfully submitted that

each of these criticisms has been rendered moot by the above amendments which clarify and amplify antecedent language correspondence and which is now believed to be exact. Again, it is respectfully submitted that no ambiguity or indefiniteness is engendered and the scope of the claims is readily determinable from the language of the claims as rejected. Further, from the statement of the rejection, it is evident that the Examiner was able to reasonably determine the scope of the respective claims.

In regard to the Examiner's question in regard to the language of claim 38, it is respectfully pointed out that the functions recited in the alternative by use of "or" are references to "alternative" sources of turn-on current for the thyristor and so disclosed at page 19, line 3. Therefore, it is respectfully submitted that inclusion of the word "or" is both correct and descriptive and that no ambiguity or indefiniteness is engendered thereby.

Accordingly, it is respectfully submitted that the above response answers all criticisms raised by the Examiner in the discussion of this ground of rejection and all such criticisms expressed by the Examiner have been shown to be in error or rendered moot by the above amendments. Therefore it is respectfully requested that this rejection of claims 19 - 32 and 38 be reconsidered and withdrawn.

In this regard, it is respectfully submitted that the rejections of claims 19 - 32 and 38 have been fully overcome and allowance of the same is clearly in order in accordance with the Examiner's indication of the allowability thereof subject to the rejections under 35 U.S.C. §112, second paragraph, being overcome. Further, it is respectfully submitted that the rejection of claims 1 - 9 under 35 U.S.C. §112, first paragraph, has been fully answered and overcome and, in the absence to prior art being applied thereto and the

rejection shown to be improper, non-substantive and based on a restrictive construction of the claim language (and rendered moot by deletion of such language) that allowance of claims 1 -.9 is in order, as well.

Since all rejections, objections and requirements contained in the outstanding official action have been fully answered and shown to be in error and/or inapplicable to the present claims, it is respectfully submitted that reconsideration is now in order under the provisions of 37 C.F.R. §1.111(b) and such reconsideration is respectfully requested. Upon reconsideration, it is also respectfully submitted that this application is in condition for allowance and such action is therefore respectfully requested.

If an extension of time is required for this response to be considered as being timely filed, a conditional petition is hereby made for such extension of time. Please charge any deficiencies in fees and credit any overpayment of fees to Attorney's Deposit Account No. 50-2041 (Whitham, Curtis & Christofferson).

Respectfully submitted,



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